



United States Attorney
Southern District of New York

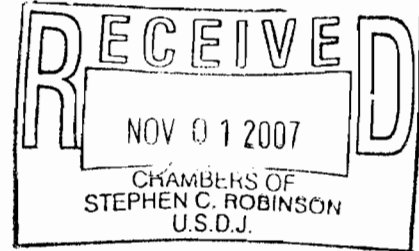
~~MEMO ENCLOSED~~

86 Chambers Street, 3rd Floor
New York, New York 10007

October 31, 2007

BY FEDERAL EXPRESS

The Honorable Stephen C. Robinson
United States District Judge
United States Courthouse
300 Quarropas Street, Room 633
White Plains, New York 10601



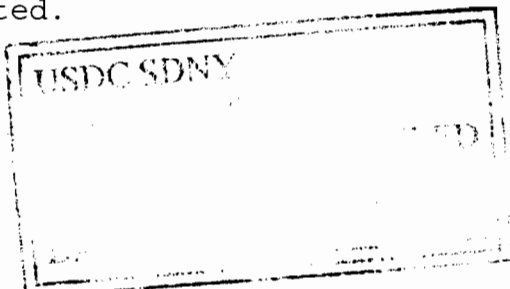
Re: Singh v. Gonzales, et al,
07 Civ. 6178 (SCR)

Dear Judge Robinson:

This Office represents the Government in the above-referenced action, which seeks mandamus relief relating to plaintiff Surinder Singh's deportation proceedings. For the following reasons, I write respectfully to request a two-week extension of time, from November 2, 2007 until November 16, 2007, to file the Government's response to the complaint in this case.

As the Court is aware, on September 21, 2007, the parties appeared for the initial status conference in this case. At that time, the Government advised the Court that it intended to move for dismissal of the complaint for lack of subject matter jurisdiction. Plaintiff's counsel, Mr. Thomas Sassone, Esq., advised the Court that he sought an opportunity to present a proposal to the Government regarding a resolution of this matter prior to motions practice. We agreed to forward any such proposal to the Bureau of Citizenship and Immigration Services prior to filing the Government's motion to dismiss.

The Government has not yet received plaintiff's proposal. However, Mr. Sassone's partner, Mr. Alexander Mulgrew, Esq., has advised me that he intends to convey a proposal shortly. In light of these circumstances, the Government respectfully requests a two-week extension of time to file its motion. Mr. Mulgrew consents to this request. This is the Government's second request for an extension. The Government's first request for a two-week extension was made in connection with its request for a pre-motion conference, which the Court granted.



APPLICATION GRANTED

Stephen C Robinson

HON. STEPHEN C. ROBINSON

11/5/07

We thank the Court for its consideration of this request.

Respectfully,

MICHAEL J. GARCIA
United States Attorney

By: 

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